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Attorneys for Defendants
SONY COMPUTER ENTERTAINMENT AMERICA LLC
SONY NETWORK ENTERTAINMENT INTERNATIONAL
LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ABRAHAM JAY KAHAN, Individually and on
Behalf of All Others Similarly Situated

Plaintiff,

v.

SONY COMPUTER ENTERTAINMENT
AMERICA LLC, and SONY NETWORK
ENTERTAINMENT INTERNATIONAL LLC,

Defendants.

Case No. 3:11-cv-02256-EMC

**STIPULATION AND ~~PROPOSED~~
ORDER TO VACATE CASE
MANAGEMENT CONFERENCE
AND ASSOCIATED DEADLINES**

reset CMC

Judge: Hon. Edward M. Chen

**STIPULATION TO VACATE CASE MANAGEMENT CONFERENCE AND
ASSOCIATED DEADLINES**

WHEREAS, defendants Sony Computer Entertainment America LLC (“SCEA”) and Sony Network Entertainment International LLC (“SNEI”), as well as certain related entities (collectively, the “Sony Defendants”), have been named as defendants in at least sixty-two (62) putative class action lawsuits, including this lawsuit, to date;

WHEREAS, a motion is currently pending before the Judicial Panel on Multidistrict Litigation (the “JPML”) to centralize this and other matters before a single district court, to which multiple responses, including the Sony Defendants’ response, have been filed to date and are under submission before the JPML, with a hearing date of July 28, 2011;

WHEREAS, the current date of the initial Case Management Conference (“CMC”) in this case is August 17, 2011 and certain other deadlines are set forth in the Order Setting Initial Case Management Conference and ADR Deadlines;

WHEREAS, the parties have agreed that it is in the best interests of all parties to vacate the CMC and associated deadlines in this case in order to facilitate the scheduling of this matter in coordination with the schedule for the motion and hearing before the JPML;

NOW, THEREFORE, all parties, by and through their respective counsel, hereby stipulate for an order as follows:

In light of the motion for centralization pending before the JPML, the CMC and all associated deadlines, including those set forth in the Order Setting Initial Case Management Conference and ADR Deadlines, in the above-entitled action shall be vacated and further pretrial and scheduling matters shall be addressed by the transferee judge following centralization or, in the event such motion for centralization is denied, the defendants will notify the Court within a reasonable time thereafter, so that the Court may at that time issue a revised case schedule.

1
2 Dated: July 20, 2011

SETH M. LEHRMAN
STEWART JAFFE
FARMER, JAFFE, WEISSING, EDWARDS,
FISTOS & LEHRMAN, P.L.

5 By: /s/ Seth M. Lehrman /s/ [as authorized]
Seth M. Lehrman

7 Attorneys for Plaintiff
ABRAHAM JAY KAHAN

9 Dated: July 20, 2011

HARVEY WOLKOFF
THAD A. DAVIS
ROCKY C. TSAI
ROPES & GRAY LLP

13 By: /s/ Rocky C. Tsai /s/
Rocky C. Tsai

15 Attorneys for Defendants
SONY NETWORK ENTERTAINMENT
AMERICA, INC.; SONY COMPUTER
ENTERTAINMENT AMERICA LLC;
SONY NETWORK ENTERTAINMENT
INTERNATIONAL LLC

18 **[PROPOSED] ORDER**

19 PURSUANT TO STIPULATION, IT IS SO ORDERED. The Case Management Conference
20 set for 8/17/11 is reset for 2/17/12 at 9:00 a.m. A Joint CMC statement shall be filed by 2/10/12.

21 Dated: 7/25/11

By: _____
S. District Court Judge

